

John P. Sheridan
Mazzola Mardon, P.C.
26 Broadway, 17th Floor
New York, NY 10004
Telephone: (212) 425-3240
Facsimile: (212) 943-6649
jsheridan@mmmpc.com

*Attorneys for Defendants International
Longshoremen's Association; ILA Local 1804-1;
ILA Local 1233; and ILA Local 1235*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X		
INTERNATIONAL UNION OF OPERATING	:	
ENGINEERS, LOCAL 825,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.
	:	2:23-cv-03689
INTERNATIONAL LONGSHOREMEN'S	:	
ASSOCIATION, INTERNATIONAL	:	
LONGSHOREMEN'S ASSOCIATION LOCAL 1233,	:	
INTERNATIONAL LONGSHOREMEN'S	:	
ASSOCIATION 1235, and INTERNATIONAL	:	
LONGSHOREMEN'S ASSOCIATION LOCAL 1804-1,	:	
	:	
Defendants.	:	
-----X		

**APPLICATION FOR EXTENSION OF TIME TO
ANSWER, MOVE, OR OTHERWISE REPLY
[Local Civil Rule 6.1(b)]**

Defendants International Longshoremen's Association ("ILA"), ILA Local 1804-1, ILA Local 1233 and ILA Local 1235 ("Defendants"), through their undersigned counsel, hereby apply pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 6.1(b), for an order extending the time to answer, move, or otherwise reply to Plaintiff's Amended Complaint.

In support of this Motion, Defendants state as follows:

1. On July 19, 2023, Plaintiff filed its Amended Complaint in the above-captioned matter.
2. On July 26, 2023, Defendants ILA Local 1233 and ILA Local 1235 were served with process, thereby requiring an answer or response to the Amended Complaint by August 16, 2023.
3. On August 8, 2023, Defendants ILA and ILA Local 1804-1 were served with process, thereby requiring an answer or response to the Amended Complaint by August 29, 2023.
4. No prior extensions of time have been requested.
5. Defendants now seek an extension of time, pursuant to Local Rule 6.1(b), until August 30, 2023, for all Defendants to answer, move, or otherwise reply.

WHEREFORE, all Defendants respectfully apply pursuant to Local Rule 6.1(b), for an order extending the time to answer, move, or otherwise reply to Plaintiff's Amended Complaint until August 30, 2023.

Dated: New York, New York
August 11, 2023

MAZZOLA MARDON, P.C.

/s/John P. Sheridan

John P. Sheridan
26 Broadway, 17th Floor
New York, NY 10004
Telephone: (212) 425-3240
Facsimile: (212) 943-6649
Email: jsheridan@mmmpc.com

*Attorneys for Defendants International
Longshoremen's Association; ILA Local 1804-1;
ILA Local 1233; and ILA Local 1235*

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of August, 2023, a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record, by operation of the court's electronic filing system.

/s/John P. Sheridan
John P. Sheridan

ORDER

The above application is **ORDERED GRANTED** extended to August 30, 2023.

ORDER DATED: _____

CLERK OF COURT

By: _____
Deputy Clerk